



1 In accordance with Federal Rule of Civil Procedure 16(b)(4), this stipulation is entered into  
2 by and among plaintiffs Mike Robertson and Katherine Pohl (collectively, "Plaintiffs") and  
3 defendant Facebook, Inc. ("Facebook") (Plaintiffs and Facebook collectively, the "Parties"), by  
4 and through their respective counsel.

5 WHEREAS, on August 14, 2014, the Court entered an order setting March 25, 2015 as the  
6 deadline for completion of class certification fact discovery, including fact witness depositions  
7 (Dkt. 135, "Scheduling Order");

8 WHEREAS, on February 13, 2015, the Court entered an order extending Facebook's class  
9 certification fact discovery deadline to April 1, 2015 (Dkt. 142);

10 WHEREAS, on February 19, 2015, Plaintiffs served a notice of Facebook's deposition  
11 pursuant to Federal Rule of Civil Procedure 30(b)(6), setting a date of March 19 for the  
12 deposition;

13 WHEREAS, on February 27, 2015, in response to Plaintiffs' counsel's inquiry, Facebook's  
14 counsel informed Plaintiffs' counsel that March 19 was not a workable date for the deposition and  
15 that alternative dates would be proposed;

16 WHEREAS, on March 16, 2015, counsel for Facebook served its objections to Plaintiff's  
17 notice of deposition, and proposed March 24-25, 2015, as alternative dates for the deposition;

18 WHEREAS, Plaintiffs' counsel was not available to conduct the deposition on March 24-  
19 25, 2015;

20 WHEREAS, to avoid undue burden and to accommodate various individuals' schedules,  
21 the Parties are meeting and conferring about the deposition date, and the possible dates being  
22 discussed are beyond the March 25, 2015 deadline set forth in the Scheduling Order;

23 WHEREAS, extending the fact discovery deadline to April 10, 2015 for the sole purpose  
24 of allowing the deposition of Facebook to be completed will not alter the date of any event or  
25 other deadline already fixed by Court order or affect any scheduling for the case other than the  
26 dates of Facebook's deposition;

1 WHEREAS, this brief extension of time will enable the Parties to complete Facebook's  
2 deposition without undue burden on the Parties;

3 NOW, THEREFORE, the Parties hereby stipulate and agree, subject to approval by the  
4 Court, as follows:

- 5 1. The deadline for completion of Plaintiffs' deposition of Facebook pursuant to Federal Rule  
6 of Civil Procedure 30(b)(6) is extended to and including April 10, 2015.

7 **IT IS SO STIPULATED.**

8  
9 Dated: March 20, 2015

NASSIRI & JUNG LLP

10  
11 /s/ Kassra P. Nassiri  
Kassra P. Nassiri (215405)  
Attorneys for Plaintiffs and the Putative Class

12  
13 Dated: March 20, 2015

ASCHENBRENER LAW, P.C.

14  
15 /s/ Michael J. Aschenbrener  
Michael J. Aschenbrener (277114)  
Attorneys for Plaintiffs and the Putative Class


16  
17 Dated: March 20, 2015

COOLEY LLP

18  
19 /s/ Matthew D. Brown  
Matthew D. Brown  
Attorneys for Defendant FACEBOOK, INC.

20 **IT IS SO ORDERED.**

21 Dated: March ḡ, 2015

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23   
HON. RONALD M. WHYTE  
UNITED STATES DISTRICT JUDGE